

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

YVETTE GRIFFIN, individually and on
behalf of all others similarly situated,
2047 Montrose Dr.
East Point, Georgia 30349

Plaintiff,

v.

THE BALTIMORE LIFE INSURANCE
COMPANY, a Maryland corporation,
10075 Red Run Road
Owings Mills, Maryland 21117

Defendant.

Case No. 1:20-cv-00476-ELH

JOINT STIPULATION TO EXTEND
ALL DEADLINES

Approved
ELH
USPJ
11/10/20

Plaintiff Yvette Griffin ("Plaintiff" or "Griffin") and Defendant The Baltimore Life Insurance Company ("Baltimore Life" or "Defendant"), through their counsel, stipulate as follows:

WHEREAS, on May 27, 2020, the Court issued a Scheduling Order in this case (Dkt. 25), establishing the following deadlines:

July 29, 2020: Moving for joinder of additional parties and amendment of pleadings

October 5, 2020: Plaintiff's Rule 26(a)(2) disclosures

November 5, 2020: Defendant's Rule 26(a)(2) disclosures

November 19, 2020: Plaintiff's rebuttal Rule 26(a)(2) disclosures

November 30, 2020: Rule 26(e)(2) supplementation of disclosures and responses

December 21, 2020: Discovery deadline; submission of status report

January 5, 2021: Response to requests for admission

February 1, 2021: Dispositive pretrial motions deadline

February 17, 2021: Class Certification Motions deadline, unless a summary judgment

motion is pending.

WHEREAS, on July 29, 2020, Defendant filed (and the Court granted) a motion for leave to file a third-party complaint (Dkts. 26, 27);

WHEREAS, on September 14, 2020 and October 26, 2020, the third-party defendants filed (and were granted) motions for extensions of time to answer or otherwise plead (Dkts. 34, 36);

WHEREAS, Plaintiff and Defendant respectfully request that the Court extend the upcoming case deadlines by a period of four (4) months. The additional time will permit the Parties sufficient time to complete discovery once the third-party defendants file their responsive pleadings. The proposed new deadlines are as follows:

April 21, 2021: Discovery deadline; submission of status report

May 5, 2021: Response to requests for admission

June 1, 2021: Dispositive pretrial motions deadline

June 17, 2021: Class Certification Motions deadline, unless a summary judgment motion is pending.

WHEREAS, the proposed extension is made for good cause and is not sought for an improper purpose.

Respectfully Submitted,

Dated: November 10, 2020

YVETTE GRIFFIN, individually and on
behalf of all others similarly situated,

By: /s/ Patrick H. Peluso
One of Plaintiff's Attorneys

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Counsel for Plaintiff and the Putative Class

**pro hac vice*

THE BALTIMORE LIFE INSURANCE CO.,

Dated: November 10, 2020

By: /s/ Thomas J. Cunningham

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Attorneys for Defendant

CERTIFICATE OF SERVICE

I hereby certify that on November 10, 2020, I caused the foregoing to be filed with the Court using the Court's electronic filing system.

/s/ Patrick H. Peluso